

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

SOUTH YORKSHIRE PENSIONS AUTHORITY,	)	Case No.: 4:12-CV-2362
	)	
	)	
GAM FUND MANAGEMENT LTD, ET AL.,	)	Case No.: 4:12-CV-2596
	)	
	)	
ELECTRICITY PENSIONS TRUSTEE LTD.,	)	Case No.: 4:12-CV-2854
	)	
	)	
HADRIAN TRUSTEES LTD IN ITS CAPACITY AS TRUSTEE OF SHIPBUILDING INDUS. PENSION SCHEME,	)	Case No.: 4:12-CV-3038
	)	
	)	
Plaintiffs,	)	
	)	
v.	)	
	)	
BP P.L.C., ET AL.,	)	
	)	
Defendants	)	

**STIPULATION AND CONSOLIDATION ORDER**

WHEREAS, Plaintiffs believe that there are common questions of law and fact between the four actions identified above (the "Actions"), and the interests of fair and efficient administration of the Actions and the avoidance of unnecessary duplicative efforts warrant the consolidation of the Actions; and

WHEREAS, Defendants do not oppose Plaintiffs' request for consolidation.

THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and between the undersigned parties, subject to the Court's approval:

1. The provisions of the Stipulations entered in the Actions regarding the schedule for filing and responding to amended complaints are rendered moot, and the Plaintiffs


need not file individual amended complaints and Defendants need not respond to the individual amended complaints contemplated by the Stipulations;

2. Plaintiffs shall have 90 days from the filing of the Hadrian Trustees Ltd. complaint to file a consolidated complaint;

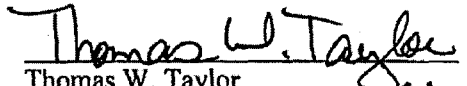
3. Defendants shall have 60 days from the filing of the consolidated complaint to answer, move to dismiss or otherwise respond to the consolidated complaint. If Defendants move to dismiss the consolidated complaint, Plaintiffs' opposition to that motion shall be due within 60 days of the filing of the motion and Defendants' reply in further support of the motion shall be due within 40 days of the filing of Plaintiffs' opposition.

Dated: October 24, 2012

STIPULATED AND AGREED:

  
Sammy Ford IV  
ABRAHAM, WATKINS, NICHOLS,  
SORRELS, AGOSTO & FRIEND  
800 Commerce Street  
Houston, Texas 77002  
Tel: (713) 222-7211  
Fax: (713) 225-0827

Marc I. Gross  
Jeremy A. Lieberman  
Jason Cowart  
Cheryl D. Hamer  
Matthew L. Tuccillo  
Emma Gilmore  
POMERANTZ GROSSMAN HUFFORD  
DAHLSTROM &  
GROSS LLP  
600 Third Avenue  
New York, New York 10016  
Tel: (212) 661-1100  
Fax: (212) 661-8665

  
Thomas W. Taylor  
S.D. Bar No. 3906  
Texas State Bar No. 19723875  
ANDREWS KURTH LLP  
600 Travis, Suite 4200  
Houston, Texas 77002  
Tel: (713) 220-4200  
Fax: (713) 220-4285  
Email: ttaylor@andrewskurth.com

Daryl A. Libow  
Amanda F. Davidoff  
SULLIVAN & CROMWELL LLP  
1701 Pennsylvania Avenue, N.W.  
Washington, D.C. 20006  
Tel: (202) 956-7500  
Fax: (202) 956-6330  
Email: libowd@sullcrom.com  
davidoffa@sullcrom.com

Patrick V. Dahlstrom  
Joshua B. Silverman  
Leigh Smollar Handelman  
POMERANTZ GROSSMAN HUFFORD  
DAHLSTROM &  
GROSS LLP  
10 South LaSalle Street, Suite 3505  
Chicago, Illinois 60603  
Tel: (312) 377-8300  
Fax: (312) 377-1184


*Attorneys for Plaintiffs*

IT IS SO ORDERED.

Richard C. Pepperman, II (pro hac vice)  
Marc De Leeuw  
SULLIVAN & CROMWELL LLP  
125 Broad Street  
New York, New York 10004  
Tel: (212) 558-4000  
Fax: (212) 291-9113  
Email: peppermanr@sullcrom.com  
delecuwm@sullcrom.com

*Attorneys for Defendants*

Signed: October 30, 2012

  
HON. KEITH P. ELLISON  
UNITED STATES DISTRICT JUDGE